

Southwestern Bell

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Richard C. Hartgrove
General Attorney

Mr. William A. Blase, Jr.
Director-Federal Regulatory
Southwestern Bell Corporation
1667 K Street, N.W., Suite 1000
Washington, D.C. 20006

Dear Bill:

Re: Comments of Southwestern Bell Telephone
Company, RM-8159

Enclosed please find an original and five (5) copies of the above-referenced pleading to be filed with the Secretary of the Commission on Monday, February 8, 1993. Also enclosed is a copy of the pleading to be filed-stamped and returned to me.

Additional copies of the pleading are attached to be used as the courtesy copies and one is included for your files.

Please call to confirm that the pleading has been filed. Thank you for your assistance.

Very truly yours,

Richard C. Hartgrove

Enclosure

1010 Pine Street
St. Louis, MO 63101

Phone 314 235-2506

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RECEIVED

In the Matter of)
)
Petition to Authorize) RM-8159
Co-Primary Sharing of the)
450 MHz Air-Ground)
Radiotelephone Service)
with BETRS)

FEB - 8 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: The Commission

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company ("SWBT"), by its attorneys and pursuant to Commission Rule 1.405(a),¹ respectfully submits its comments in the above-captioned proceeding. In their Joint Petition for Rulemaking ("PFR"), several organizations² propose that the Commission commence a rulemaking to authorize Basic Exchange Telecommunications Radio Service ("BETRS") licensees to hold co-primary status with licensees of the older Air-Ground Radiotelephone Service ("ATG") operating in the 450 MHz band. SWBT supports the petitioners' recommendation that the Commission initiate a rulemaking proceeding to address this issue.

As currently defined by the Commission's rules, BETRS is one of the public radio services available through the Rural Radio Service. BETRS provides public message communications service between a central office and subscribers located in rural areas.³

¹ 47 C.F.R. Section 1.405(a).

² Petitioners are National Rural Telecom Association, National Telephone Cooperative Association, Organization for the Protection and Advancement of Small Telephone Companies, Rural Electrification Administration and U.S. Telephone Association.

³ 47 C.F.R. Section 22.2.

When it established BETRS in 1988,⁴ the Commission determined that the service promoted the public interest by bringing basic exchange service to remote areas.⁵ The BETRS Order authorized co-primary access to all BETRS licensees on both the 150 MHz and 450 MHz bands (within the Public Land Mobile Service) and on 50 channels in the 800 MHz band (within the Private Radio Service).⁶ SWBT believes that the public interest may be better served if the additional 450 MHz band spectrum now devoted to ATG were also permitted for use by BETRS.

SWBT currently uses BETRS to allow rural customers to convert their multi-party line telephone service to single-party line service without the need for SWBT to install additional cable. BETRS also eliminates the need for SWBT to install new cable to replace deteriorated cable in rural areas. In both cases, using BETRS clearly is a more cost-effective alternative than installing cable.

However, the present spectrum assignment for BETRS is limited and frequently very congested. Thus, there is minimal opportunity for SWBT to rely on BETRS to meet additional communications needs in rural areas, particularly in those areas experiencing population growth. Assignment of additional spectrum for BETRS use, as envisioned by the petitioners, could enable cost-

⁴ In the Matter of Basic Exchange Telecommunications Service, Report and Order ("BETRS Order"), 3 FCC Rcd. 214 (1988), Memorandum Opinion and Order on Reconsideration, 4 FCC Rcd. 5017 (1989).

⁵ BETRS Order at 214, para. 4.

⁶ BETRS Order at 217, 218, paras. 31, 36.

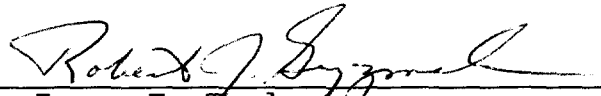
effective BETRS deployment to better serve SWBT's existing and future rural customers.

Furthermore, due to the inherent propagation characteristics of 150 MHz band transmissions, as noted by petitioners,⁷ BETRS equipment is typically available only for use within the 450 MHz band. Additional spectrum allocation within the 450 MHz band for BETRS use could encourage BETRS equipment vendors to develop new or more advanced equipment and technology, thus increasing BETRS' potential applications.

For these reasons, SWBT supports petitioners' recommendation that the Commission initiate a rulemaking proceeding to consider authorizing BETRS licensees to share the 450 MHz band with ATG licensees on a co-primary basis.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By 
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Attorneys for
Southwestern Bell Telephone Company

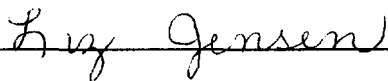
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February 8, 1993

⁷ PFR at 5.

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing
Comments of Southwestern Bell Telephone Company in RM-8159,
have been served this 8th day of February, 1993 to the
Parties of Record.


Liz Jensen

February 8, 1993

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